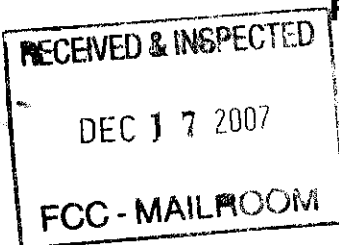


Steve Huber's **OUTDOOR** Frontiers

**The Future of Outdoor Media and
Adventure
Internet and Television**

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Rhineland, WI 54501
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Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th St. SW
Washington DC, 20554

RE: Petition for Full Exemption from Closed-Captioning Requirements.

To Whom It May Concern:

OutdoorFrontiers Multi-Media LLC respectfully submits this petition requesting exemption from the closed-captioning requirements under the Commission's Rules, 47 C.F.R. 79.1 based upon the "Undue Burden" standard and regulations.

Introduction and Overview:

OutdoorFrontiers Multi-Media LLC (OFMM) was formed in 2005. The primary objective of the company is to produce a television show, "Steve Huber's OutdoorFrontiersTV." The purpose of the show is to provide entertaining and informative programming on topics relating to fishing and hunting. OFMM is currently in its first broadcasting season, at the time of this writing, nine episodes of thirteen have been aired with production of the remaining four episodes currently unfinished. The broadcast season began on October 2nd, 2007 and is intended to run to the end of first quarter, 2008.

It is the intent to re-broadcast these thirteen episodes during the first quarter of 2008, go into hiatus for six months to gather more footage and edit more shows for the 2008/2009 broadcast season, tentatively scheduled to begin once again at the beginning of 4th quarter 2008 with twenty-six airings of thirteen episodes. It is our goal to expand to provide thirteen weeks of fishing programming and thirteen weeks of hunting programming.

I am the only "full-time" employee of OFMM, even though I have yet to draw any income.

The program is filmed on location in various parts of the United States and Canada. As stated before, it is currently our intent to produce thirteen fishing/hunting episodes to be aired and then re-run. Each program is 28 minutes and 30 seconds in length and is aired only on one network, The Sportsman Channel. I purchase the airtime from The

Sportsman Channel and have been able to sell some of the advertising time to cover expenses.

Due to financial constraints, I am responsible for overseeing production of the show. I market the show to potential advertisers, write the scripts, host the show, assist with the filming/editing, convert the finished show from a digital format to analog and ship the finished tape to the network in New Berlin, Wisconsin. My primary assistance in the entire production is volunteer help from my son, James Huber, with other volunteer help provided by my wife Janet and other family friends.

Nature and cost of the Closed-Captioning for the programming:

The Sportsman Channel did inform me of our need to close-caption our show effective January 1, 2008. However, the network and I feel that we fall under the "Undue Burden" aspect of the exemption and as such, must petition the F.C.C. for exemption.

I have made numerous inquiries to various suppliers of closed-captioning services. The prices quoted to me for this service ranged from a low of \$200 per episode to as high as \$550.00. The "Low" price requires that I send in a transcript of the show, which adds to the production burden and cost for a "1 ½ Man" operation.

Impact of Closed-Captioning:

For me to add \$2,600.00 - \$7,150.00 plus additional production time to produce thirteen episodes at this point in my fledgling company's existence would be extremely difficult and would likely force me out of business.

With barely enough sponsors to cover basic operating costs, the additional financial burden would require me to increase my costs to sponsors, thus pricing myself out of the market, again forcing me to shut down operations.

Workload:

As mentioned earlier, I am basically a one-man operation. Without my son's help, I would be unable to even produce what I do now and meet deadlines. The additional time and money required to close-caption the show at this point in my company's existence is just not possible.

Even now, I find myself working six to seven days per week with my son helping as much as he can in order to meet deadlines. I was told that I would need to add two weeks to the production time frame and again, right now, that would be more than difficult, it would be virtually impossible. Having the business headquartered in a small city in northeastern Wisconsin, there are no local services providing closed-captioning, which would require shipping finished programs to distant CC services, adding additional costs and time.

Financial Resources of Program Provider:

Since 1990, I have been a full-time professional firefighter. In August of 2006, I experienced a heart attack and was declared disabled, unable to perform my duties as an emergency responder.

Being the type of person unable to just sit in the house and be content to collect a disability pension check, I talked with my doctors and after much consideration they determined that providing I take it easy, I should be able to produce/host a television show. This is good because I did apply for many part-time jobs and found that no one was willing to hire a 50 year old firefighter with a bad heart. This "job" gives me a sense of purpose and helps both my physical and mental well-being.

However, my personal monthly income from my state disability pension is under \$2,900.00 per month. This is a significant drop in income from the days when I was "working."

I have not gone through all of my expense receipts for the year, totaling up all of my expenses for producing the shows, but I do know this.

It costs in excess of \$18,000.00 to purchase twenty-six weeks of programming from the network. I am expecting a projected GROSS income of \$28,200.00 from my marketing efforts/advertising sales for the 2007/2008 broadcast season, providing the sponsors do fulfill their contract obligations.

From that projected gross income already has come in excess of \$8,000.00 to purchase one quarter of air time, \$870 for camera repair, \$800 to replace a computer that was damaged by a lightning strike, and another \$550.00 for additional computer equipment that was necessary to complete production of the show in a reasonably efficient manner.

This has left me with \$17,980.00 in which to travel to locations to film (of which in excess of 6,000 miles were driven to two locations that resulted in no viable episodes because of bad weather), market the show, travel to sponsor's locations for business meetings and to film, cover shipping costs to send the tapes to the network, needed office supplies, fuel, hunting/fishing licenses, ammunition, meals while traveling, web site hosting and other "costs of doing business."

Many of these costs were anticipated, however repairs on a \$5,000 camera just barely out of warranty as well as replacement of a surge protected computer and the purchase of another computer were unanticipated and devastating to my bottom line. As it stands now, I have a "backup camera" that needs repair but because of the other "issues," it remains unusable for the time being.

The increase in fuel alone has been almost unbearable and has forced me to change my filming schedule for this year already and I am unsure what will happen for next year. Now to take almost 10% of my gross income (before expenses) to close-caption the thirteen weeks of re-run programming is untenable.

As it is now, I have not drawn one penny from the company for personal wages and I have been using personal funds to help my son out with needed car repairs and we feed him dinner on days when he's editing in order to help him out.

Summary:

I am not trying to shirk my responsibilities as a television show producer. I have devoted much of my professional life to serving and protecting those in need, and as such will provide closed-captioning for my programs when I can afford to do so. It is just that right now, to have it in place for January 1 of 2008 is literally impossible, if only from a time aspect.

I have been talking to many different companies, seeking a sponsor of closed-captioning to cover my raw costs, however in today's economy, I am finding that to be extremely difficult.

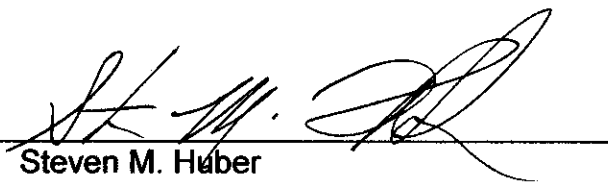
It is my intention to continue to market my show, to gain more and larger sponsors and to find a company that believes in public service as much as I do. Once I do find such a benefactor, I certainly will, and without hesitation have all shows close-captioned for the hearing impaired. It is my hope to have this in place before I begin airing the show again in October of 2008.

Please consider this application for exemption favorably. Right now, if it is required, I will have no other alternative than to shut down my company and remove all broadcasts from the air.

I do not wish this to happen.

Respectfully submitted,

OutdoorFrontiers Multi-Media LLC

By: 
Steven M. Huber
Sole-Proprietor

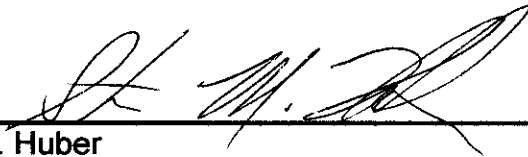
OutdoorFrontiers Multi-Media LLC
119 E. Frederick Street
Rhineland, WI 54501

E-Mail: steve@outdoorfrontiers.com

Affidavit

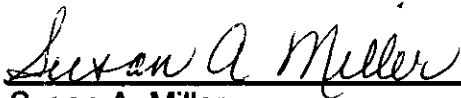
State of Wisconsin
County of Oneida
City of Rhinelander

Before me, the undersigned authority, on this the 12th day of December, 2007, personally appeared Steven M. Huber in his capacity as President and Sole Member of OutdoorFrontiers Multi-Media LLC, the petitioner in the foregoing petition for Closed-Captioning Exemption, and being by me duly sworn on oath deposes and avers that all statements and representations made in the Petition are true and accurate to the best of his knowledge.



Steven M. Huber

SWORN TO and SUBSCRIBED BEFORE ME, by said Steven M. Huber, this the 12th day of December, 2007, to certify and witness my hand and seal of office.



Susan A. Miller

Notary Public, State of Wisconsin *update 7-5-09.*